

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF SARAH R. LONDON IN
SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANTS' MOTIONS TO EXCLUDE
EXPERT TESTIMONY**

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

Judge: Honorable Charles R. Breyer
Date: January 6, 2026
Time: 10:00 A.M. PT
Courtroom: 6 –17th Floor

DECLARATION OF SARAH R. LONDON
Case No. 3:23-md-03084-CRB

I, Sarah R. London, declare:

1. I am an attorney in the law firm of Girard Sharp LLP, appointed Co-Lead and Liaison Counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. I submit this declaration in support of Plaintiff's Opposition to Defendants' Motions to Exclude Expert Testimony.

3. The exhibits referred below are attached to Plaintiff's Opposition to Defendants' Motions to Exclude Expert Testimony.

4. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the In re Uber Rideshare Cases, JCCP No. 5188 trial transcripts.

5. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from Uber's opening slides from the first bellwether trial in *In re Uber Rideshare Cases*, JCCP No. 5188.

6. Attached hereto as **Exhibit 3** is a true and correct copy of October 20, 2025 Addendum to Expert Report of Report of Veronique Valliere. As permitted by PTO 34, this document has been provisionally filed under seal.

7. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the October 30, 2025, deposition of Thomas Tremblay. As permitted by PTO 34, this document has been provisionally filed under seal.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of December, 2025 in San Francisco, California.

/s/ Sarah R. London

Sarah R. London